

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
COURT FILE NO.: CV-

GEORGE M. SPRINGER,

Plaintiff,

vs.

UNITED COLLECTIONS BUREAU, INC.

Defendant.

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COMPLAINT

JURY TRIAL DEMANDED

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1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act, (“FDCPA”), 15 U.S.C. §1692, et. seq.
 2. The Court has jurisdiction pursuant to 15 U.S.C. §1692k, 28 U.S.C. §1331.
 3. Plaintiff is a natural person who resides in Washington County, Pennsylvania.
 4. Plaintiff is a consumer within the definition of the FDCPA.
 5. Defendant holds itself out to the public as a collection agency.
 6. Defendant is a debt collector within the definition of the FDCPA.
 7. Defendant’s collection efforts took place within the past year.
 8. The Plaintiff gave the Defendant the name and number of the attorney that was representing him in connection with the alleged debt Defendant was attempting to collect.
 9. The Defendant told the Plaintiff, “[I]f you can afford an attorney, than you should pay your bills.”
 10. The Defendant continued to contact he Plaintiff directly.

11. The Defendant contacted the Plaintiff at work after being told not to.
12. On or about September 12, 2007, the Plaintiff received a call from Defendant's agent/employee, "Amanda."

13. Amanda threatened to garnish the Plaintiff's wages.
14. Amanda threatened to seize the Plaintiff's bank account.
15. Amanda told the Plaintiff, "[L]earn to pay your debts."

FIRST COUNT

16. In Defendant's collection efforts, defendant violated the FDCPA, *Inter alia*, §1692c(a)(1), 1692c(a)(2), 1692d, 1692e, 1692e(4), 1692e(5), 1692e(10) and 1692f.

13. As a result of defendant's illegal collection activities, plaintiffs suffered emotional distress, as well as unjustified invasions of personal privacy.

WHEREFORE, plaintiff respectfully requests this Court to:

- A. Award plaintiff such damages as permitted by law, including statutory and actual damages; and
- B. Award plaintiff the costs and reasonable attorney's fees.

Date: September 10, 2008

Respectfully submitted,

JEFFREY L. SUHER, P.C.

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